REMARKS

Examiner Interview

On October 6, 2008, Applicants' representatives, Michael Glenn and Elizabeth Ruzich, conducted an Examiner Interview with Examiner Spooner. During the interview, the parties discussed a proposed claim amendment for Claim 1 to overcome the rejections under 35 USC 112. The parties came to an agreement on the specific language to be used in the amended claim and the amended claims submitted herewith contain the language as accepted by the Examiner. Applicants thank the Examiner for his careful analysis of the claims and willingness to discuss them in such detail.

35 USC 112

Claims 1, 4-16, 19-31, 34, 45, and 48 are rejected under 35 USC 112 for being indefinite. These claims are also rejected under 35 USC 112 for failing to comply with the written description requirement.

Applicants amend the claims to more clearly recite the invention. Support for these amendments can be found throughout the specification. For the Examiner's convenience, Applicants explain where there is support in the specification for each feature recited in Claim 1. Because the amendment to Claim 1 is substantially similar to the amendments made to independent Claims 9, 15, 16, 24, and 30, this explanation applies to all independent claims.

Applicants refer the Examiner to Figures 4 and 5 as guides and use the reference characters contained in these figures for illustrative purposes only. Claim 1 recites a process for reordering items in a database to be retrieved for display to a user. This

process comprises the steps of ordering a plurality of words stored in a linguistic database (LDB) 401 according to a preferred linguistics frequency of use model. The linguistics model is described, for example, on page 5, lines 20-30. Each word stored in the LDB is associated with an object number. See, for example, page 8, lines 26-27 (object number in the LDB 505 for words that are contained in the Linguistic Database 401). User input from a keyboard is accepted. See, for example, page 4, line 37-page 5, line 4. Any words that match the user's input are retrieved from the LDB. See, for example, page 7, lines 18-20. The retrieved words are displayed as ordered in the LDB. See, for example, page 7, lines 17-20.

If the list does not include a word, the user-defined word is accepted and stored in a user database (UDB). See, for example, page 9, lines 5-8. A frequency count is assigned to the user-defined words and stored in the UDB. See, for example, page 8, lines 23-27.

The user can select a word from the displayed list. Page 6, lines 2-8. Every selected word is assigned a frequency count. See, for example, page 6, lines 10-12. The frequency count 503 of the selected word and the word's corresponding object number 505 are stored in the UDB. See, for example, page 8, lines 21-27.

Subsequent user input is accepted. See, for example, page 9, lines 16-17. Any words from the LDB and user-defined words from the UDB that match the user's subsequent input are retrieved. See, for example, page 9, lines 16-20. If more than one word matches the user's subsequent input, any matching words in the LDB and any matching words in the UDB are dynamically reordered according to the frequency count. See, for example, page 9, lines 16-20. A list of the ordered matching words if more than one word matches is displayed. See, for example, page 4, lines 21-25.

35 USC 102(e)

The Examiner rejects Claims 1, 4-8, 11, 14, 16, 19-23, 26, 31, 34, 38, 45, and 48 under 35 USC 102(e) as being anticipated by King (U.S. Patent No. 6,307,549). Applicants respectfully traverse.

King discloses a reduced keyboard disambiguating system where words are stored in the form of objects associated with an arbitrary keystroke sequence. Column 13, 9-10. The objects are ordered in decreasing frequency of use. Column 13, lines 59-61. This frequency of use can be modified according to a user's frequency of use as opposed to a default frequency of use setting. Column 14, lines 11-13.

King does not disclose only associating a frequency of use with words selected by a user and user-defined words. In King, all words are associated with a frequency of use. In amended Claims 1, 9, 15, 16, 24, and 30, on the other hand, only words selected by a user or user-defined words are associated with a frequency of use. All other words are ordered according to a predetermined linquistics frequency of use model that is not also stored in the database. Thus, the system disclosed in King requires more storage.

Furthermore, King does not disclose taking a list of words ordered according to a default frequency of use and reordering them according to a frequency of use associated with words selected by a user and with user-defined words. In King there is only one list of words where all words are associated with a frequency of use and ordered accordingly. Thus, the invention disclosed in independent Claims 1, 9, 15, 16, 24, and 30 is more efficient and requires less storage space.

Allowable Subject Matter

The Examiner indicated that Claims 9, 15, 24, and 30 would be allowable if rewritten in independent form. Thus, Applicants amend Claims 9, 15, 24, and 30 to be in independent form.

Conclusion

Applicants respectfully posit that all rejections of the claims have been overcome. Accordingly, Applicants respectfully request allowance of all claims. The Examiner is invited to please contact Applicants' attorney at (650) 474-8400 should any questions arise.

Respectfully submitted,

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